

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
AIU INSURANCE COMPANY,

Plaintiff,

-against-

TIG INSURANCE COMPANY,

Case No. 07-CV-7052 (SHS)

Defendant.

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

-----X

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Sean Thomas Keely, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Catherine E. Isely, Esq.  
Butler Rubin Saltarelli & Boyd LLP  
70 West Madison Street, Suite 1800  
Chicago, IL 60602  
Phone: (312) 444-9660  
Fax: (312) 444-9287

Catherine E. Isely is a member in good standing of the Bar of the State of Illinois. There are no pending disciplinary proceedings against Catherine E. Isely in any State or Federal Court.

FILED  
U.S. DISTRICT COURT  
2007 SEP 26 PM 4:49  
S.D.N.Y.

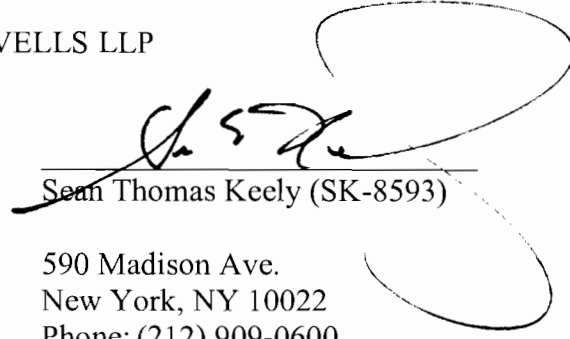
1007 024  
LP 20 2007  
-S78  
178  
628164 207  
578  
h71827

- 2 -

Dated: New York, New York  
September 26, 2007

Respectfully submitted,

LOVELLS LLP

By:  Sean Thomas Keely (SK-8593)

590 Madison Ave.  
New York, NY 10022  
Phone: (212) 909-0600  
Fax: (212) 909-0660

*Attorneys for Defendant  
TIG Insurance Company*

TO: William A. Maher, Esq.  
Marc L. Abrams, Esq.  
Wollmuth Maher & Deutsch LLP  
500 Fifth Avenue  
New York, New York 10110  
(212) 382-3300

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
AIU INSURANCE COMPANY,

Plaintiff,

-against-

Case No. 07-CV-7052 (SHS)

TIG INSURANCE COMPANY,

Defendant.

-----X

**AFFIDAVIT OF  
SEAN THOMAS KEELY  
IN SUPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

STATE OF NEW YORK     )  
                                  )     ss:  
COUNTY OF NEW YORK )

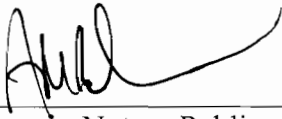
Sean Thomas Keely, being duly sworn, hereby deposes and says as follows:

1. I am Of Counsel with the firm Lovells LLP, counsel for Defendant TIG Insurance Company in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Catherine E. Isely as counsel pro hac vice to represent Defendant in this matter.
2. I am a member in good standing of the bar of the State of New York and this Court.
3. Catherine E. Isely is a member of the firm Butler Rubin Saltarelli & Boyd LLP, and is a member in good standing of the bar of the Supreme Court of Illinois. An original certificate of good standing issued by the clerk of the Supreme Court of Illinois is attached hereto as Exhibit A.

4. I have found Ms. Isely to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.
5. Accordingly, I am pleased to move the admission of Catherine E. Isely, pro hac vice.
6. I respectfully submit a proposed order granting the admission of Catherine E. Isely, pro hac vice, which is attached hereto as Exhibit B.

WHEREFORE, it is respectfully requested that the Court grant the motion to admit Catherine E. Isely, to represent Defendant in the above-captioned matter.

Sworn to before me this  
26th day of September, 2007.

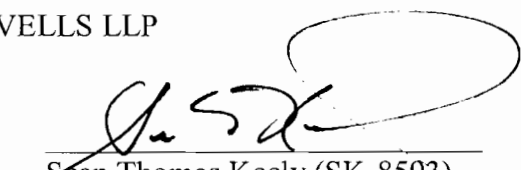


Notary Public

ANDREW M. BEHRMAN  
Notary Public, State of New York  
Reg. No. 02BE6132944  
Qualified in New York County  
Commission Expires Aug. 29, 2009

Respectfully submitted,

LOVELLS LLP

By:  Sean Thomas Keely (SK-8593)

590 Madison Ave.  
New York, NY 10022  
Phone: (212) 909-0600  
Fax: (212) 909-0660

Attorneys for Defendant  
TIG Insurance Company

## CERTIFICATE OF GOOD STANDING



*United States of America*

}ss. Catherine Eleanor Isely

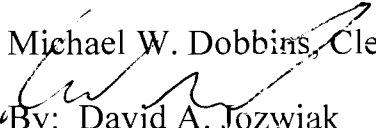
*Northern District of Illinois*

I, Michael W. Dobbins, Clerk of the United States District Court  
for the Northern District of Illinois,

DO HEREBY CERTIFY That Catherine Eleanor Isely  
was duly admitted to practice in said Court on (12/18/1996)  
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois  
on (09/05/2007 )

Michael W. Dobbins, Clerk,

By:   
David A. Jozwiak  
Deputy Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
AIU INSURANCE COMPANY,

Plaintiff,

-against-

TIG INSURANCE COMPANY,

Defendant.

Case No. 07-CV-7052 (SHS)

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

-----X

Upon the motion of Sean Thomas Keely, attorney for Defendant TIG Insurance Company,  
and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Catherine E. Isely, Esq.  
Butler Rubin Saltarelli & Boyd LLP  
70 West Madison Street, Suite 1800  
Chicago, IL 60602  
Phone: (312) 444-9660  
Fax: (312) 444-9287  
Email: [cisely@butlerrubin.com](mailto:cisely@butlerrubin.com)

is admitted to practice pro hac vice as counsel for Defendant TIG Insurance Company in the  
above-captioned case in the United States District Court for the Southern District of New York.  
All attorneys appearing before this Court are subject to the Local Rules of this Court, including  
the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case  
Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov).  
Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: New York, New York  
September \_\_, 2007

---

United States District Judge

**PROOF OF SERVICE**

I am over the age of 18 and not a party to the within action; my business address is: 590 Madison Avenue, New York, New York, 10022.

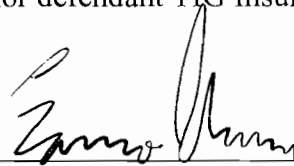
On September 26, I served the **MOTIONS TO ADMIT COUNSEL PRO HAC VICE** with respect to Julie Aldort, Catherine Isely, Amy Pines and James Rubin in this action by placing true copies thereof in sealed envelopes addressed as follows:

William A. Maher, Esq.  
Marc L. Abrams, Esq.  
Wollmuth Maher & Deutsch LLP  
500 Fifth Avenue  
New York, New York 10110  
(212) 382-3300

**BY EXPRESS DELIVERY (VIA FEDERAL EXPRESS):** I caused said envelope(s) to be delivered within three business days via Federal Express in lieu of delivery by mail to the addressee(s).

Executed on September 26, 2007 at New York, New York.

I declare that I am employed in the office of counsel for defendant TIG Insurance Company at whose direction the service was made.

A handwritten signature in black ink, appearing to read 'Eamon Mason', is written over a horizontal line.

EAMON MASON